

09/070,831

REMARKS

Claims 10 and 41-61 are all the claims pending in the application. Claim 10 stands rejected upon informalities. Claims 41-61 stand rejected on prior art grounds. Applicants respectfully traverse these objections/rejections based on the following discussion.

**L The 35 U.S.C. §112, First Paragraph, Rejection**

Claim 10 stands rejected under 35 U.S.C. §112, first paragraph. More specifically, the Office Action argues that the process of selecting an event and testing each rule against each selected event is contradictory. Applicants submit that the claim is intended to define the process whereby one or more of events are selected (according to criteria not specified in claim) and then rules in the library are compared to the event(s) that were selected to determine which rules will apply to presentation. The process of selecting the events is independent of the rules in the library and the claim does not provide any criteria upon which an event will be selected.

However, the rules which are applied to the presentation are dependent upon the events that are selected, as defined in the "selecting" step in claim 10. Therefore, after the events are selected (according to independent criteria), they are tested to determine which rules will apply to the presentation. In order to clarify any ambiguity, claim 10 has been amended to specifically define that the testing process tests each rule in the library against each selected event "to determine which rules will be applied to said presentation." Further, the claims have been editorially amended to read more clearly and to correct antecedent basis issues by removing "document", changing "modified" to "expanded" and adding "sequence" where appropriate. Applicants note that these changes do not narrow or broaden the claims, in that the same process is being performed as was being performed before the claims were amended. Therefore, it is Applicant's intention that these amendments not broaden or narrow the claims. To the contrary, these amendments are made only to clarify that the selecting and testing steps are not

09/070,831

contradictory and to make the claims more readable. In view of the foregoing, the Examiner is respectfully requested to reconsider and withdraw this rejection.

## II. The Prior Art Rejections

Claims 41-45, 48-51 and 54 stand rejected under 35 U.S.C. §102(e) as being anticipated by Stack (U.S. Patent No. 5,815,717). Claims 46-47, 52-53 and 55-61 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Stack in view of Throckmorton, et al. (U.S. Patent No. 5,818,441), hereinafter referred to as Throckmorton. Applicants respectfully traverse these rejections based on the following discussion.

### A. The Rejection Based on Stack

Applicants respectfully traverse this rejection because Stack describes a process of automatically generating computer code, while the claimed invention is directed to "modifying a previously-generated presentation." Stack does not relate to the field of generating or modifying presentations. Further, Stack does not modify anything, but instead creates an original product (in this case, the computer code for an application program). For example, the claimed invention as defined by independent claim 41, includes a process step of "automatically modifying, without user intervention, said previously-generated presentation based on said rules to produce a modified presentation" (independent claim 49 defines a similar process of expanding the previously-generated presentation and claim 55 also defines a similar process of combining previously-generated presentations). To the contrary, as explained in greater detail below, Stack describes a process whereby program rules, skill rules, and syntax rules are applied in order to generate compilable or interpretable code and associated documentation (column 5, lines 43-48). Thus, as explained below, Stack does not teach (much less suggest) the invention defined by independent claims 41 and 49.

09/070,831

For a reference to anticipate a claimed invention, the reference must teach each and every feature of the claimed invention. Independent claims 41 and 49 defined "a method of modifying previously-generated presentations." Independent claims 41 and 49 also defined processes of automatically modifying and automatically expanding the previously-generated presentation. Here, Stack does not teach anything relating to presentations and cannot, therefore, teach anything relating to modifying previously-generated presentations. Further, Stack only creates new compilable computer code and does not modify anything that was previously created.

For example, Stack explains in column 10, lines 22-26 that once the application structure and application sequences are received from the user through the graphic user interface image editor 32, that an application author can be invoked to generate compilable or interpretable code (also see column 5, lines 43-48). One aspect of Stack is that it allows the user to graphically modify the image editor 32 to identify where information will appear on the graphic user interface screen (column 13, lines 4-16). However, this feature in no way relates to the claimed process of modifying previously-generated presentations. Instead, the image editor 32 discussed in Stack is merely the graphic user interface through which the user provides input regarding a functional relationship of segments of the program, the topic of the program, the process to be carried out by the program, the specific fields or display area that will be process by the program, etc. ( see column 9, lines 15-39). This information and is then utilized by the application author to generate the computer code (column 10, lines 23-26).

Thus, it is Applicant's position that Stack does not in any way relates to presentations or any process of modifying previously-generated presentations, but instead that Stack is limited to the automatic generation of computer compilable code based upon user input and previously established rules. Thus, Applicants submit that Stack does not teach "automatically modifying, without user intervention, said previously-generated presentation based on said rules to produce a modified presentation" as defined by independent claim 41 or "automatically expanding, without user intervention, said previously-generated presentation based on said rules to produce an expanded presentation" as defined by independent claim 49. Therefore, it is Applicant's position that independent claims 41 and 49 are not anticipated by Stack. Further, dependent claims 42-45,

09/070,831

48, 50, 51, and 54 are similarly not anticipated by Stack, not only because they depend from a non-anticipated independent claim, but also because of the additional features they define. In view of the foregoing, the Examiner is respectfully requested to reconsider and withdraw this rejection.

**B. The Rejection Based on Stack in view of Throckmorton**

As shown above, Stack does not relate to presentations or the automatic modification of such presentations. The Office Action makes reference to Throckmorton for the limited purpose of teaching that continuous media presentations can include audio/video components and that video content can be edited. The Office Action does not propose that Throckmorton teaches (and Throckmorton does not teach) a method of modifying previously generated presentations based on a set of rules.

Applicants first note that one ordinary skill in the art of compilable computer code generation would not have made reference to the interactive television teachings within Throckmorton, and vice versa. There is no motivation to within either reference (or any other reference of record) that would allow the combination of these dramatically different art fields. Further, it is unclear how the combination of a system that automatically produces compilable computer code would profit a television system that is linked with the Internet. There simply is no logical overlap between these vastly different types of technologies. Thus, Applicants first submit that the Office Action has not set forth a *prima facie* case of obviousness.

Secondly, neither reference teaches or suggests the claimed features of modifying previously-generated presentations based upon rules. The lack of any such teachings within Stack has been set forth in detail above and a redundant discussion of the same is avoided and, instead, reference is made to the previous discussion. Throckmorton is similarly silent regarding any such teachings.

Throckmorton discloses a system that allows a user to be interactive with their television by combining the Internet with a television broadcast using split screens, etc. For example, in the

09/070,831.

paragraph appearing in column 3, lines 35-54, Throckmorton describes the conventional way in which television shows and other presentations are provided to users. Then, in the paragraph appearing in column 3, lines 55-67, Throckmorton introduces the concept of associated data (such as World Wide Web or Internet data) which is related to the television broadcast and which Throckmorton desires to combine with the television broadcast. As shown in Figure 1, and described in column 4, lines 1-33, Throckmorton combines the television broadcast data with the associated data allowing the user to be interactive with their television. However, none of this (or any of the remaining disclosure within Throckmorton) relates to the modification of the television show (presentation) being presented to the user. The invention relates to the automatic modification of such television shows (presentations) based upon user-established rules, without requiring user intervention during the modification process. In other words, Throckmorton merely describes a system that combines web sites that are related to broadcast television shows, while the invention relates to the automatic modification of the show itself based on previously established rules.

Thus, it is Applicant's position that Stack would not have been combined with Throckmorton and that any combination of Stack and Throckmorton would not teach or suggest the claimed process of modifying previously-generated presentations. Thus, Applicants submit that the proposed combination of Stack and Throckmorton does not teach "automatically modifying, without user intervention, said previously-generated presentation based on said rules to produce a modified presentation" as defined by independent claim 41, "automatically expanding, without user intervention, said previously-generated presentation based on said rules to produce an expanded presentation" as defined by independent claim 49, or "automatically combining, without user intervention, said previously-generated presentations based on said rules to produce said composite presentation sequence" as defined by independent claim 55. Therefore, it is Applicant's position that independent claims 41, 49, and 55 are patentable over the proposed combination of Stack and Throckmorton. Further, dependent claims 46, 47, 52, 53, and 56-61 are similarly patentable over the proposed combination of Stack and Throckmorton, not only because they depend from a patentable independent claim, but also because of the

09/070,831

additional features they define. In view of the foregoing, the Examiner is respectfully requested to reconsider and withdraw this rejection.

### III. Formal Matters and Conclusion

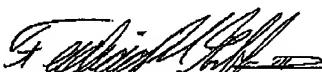
In view of the foregoing, Applicants submit that claims 10 and 41-61, all the claims presently pending in the application, are patentably distinct from the prior art of record and are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue at the earliest possible time.

Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary.

Please charge any deficiencies and credit any overpayments to Attorney's Deposit Account Number 50-0510.

Respectfully submitted,

Dated: 12/6/04



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